

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation;
and VERA BRADLEY DESIGNS, INC., an
Indiana corporation,

Plaintiffs,

v.

ZHEN WANG "JOHNNY" ZHANG, an
individual; FABBY GLOBAL TRADING, LLC
d/b/a "CALIBEAN COLLECTION," a Texas
limited liability corporation; UNIVERSAL
EXPO GROUP INC., a Texas corporation; and
JOHN DOES 1-10;

Defendants.

No. 2:18-cv-00352-RSM

**STIPULATED PERMANENT
INJUNCTION**

STIPULATION

Plaintiffs Amazon.com, Inc. ("Amazon") and Vera Bradley Designs, Inc. ("Vera Bradley"), and Defendants Zhen Wang "Johnny" Zhang, Fabby Global Trading, LLC d/b/a "Calibeans Collection", and Universal Expo Group Inc. (collectively, "Defendants"), by and through their respective counsel of record, hereby stipulate and agree as follows:

1. The Court may enter the following permanent injunction.
2. Defendants hereby fully and irrevocably consent to the jurisdiction of the state and federal courts in King County, Washington, in any action or proceeding in which Amazon

1 or Vera Bradley seeks to enforce this injunction or otherwise stemming from Defendants'
2 noncompliance with this injunction.

3 DATED: January 30, 2020

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5 *Vera Bradley Designs, Inc.*

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1 **PERMANENT INJUNCTION**

2 Pursuant to the terms of the settlement agreement reached in this matter, including the
3 parties' agreement to stipulate to a permanent injunction, IT IS HEREBY ORDERED that
4 Defendants, their agents, representatives, employees, successors, and assigns are permanently
5 enjoined and restrained from:

6 1. selling, offering for sale, advertising, marketing, shipping, transmitting, or
7 distributing to Amazon, or to any other person or entity through any of Amazon's websites, any
8 product or service;

9 2. applying for, opening, operating, controlling or using any Amazon seller or
10 vendor account, or applying for or participating in any Amazon Affiliate Program;

11 3. manufacturing, distributing, offering to sell, or selling any product or service
12 that incorporates Vera Bradley's brand, trademarks, or copyrights, or otherwise uses Vera
13 Bradley's brand, trademarks, or copyrights to manufacture, distribute, offer, or sell any product
14 or service; and

15 4. assisting, aiding, or abetting any other person or entity in engaging in or
16 performing any of the activities listed above.

17
18 **IT IS SO ORDERED.**

19
20 DATED: February 3, 2020

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22 **RICARDO S. MARTINEZ**
23 **CHIEF UNITED STATES DISTRICT JUDGE**